

The United States District Court
for the
District of Massachusetts

C. Deborah Phillips et. al.
V.

Dana Harris et. al.

Civil Action No. 04-30250

**Motion for Extension of Time / Continuance to File Opposition of
Order to Dismiss and File Appropriate Amended Complaint Rule 40.3/**

The plaintiff, Deborah Phillips moves the court to extend time continuing the matter by Opposition and allowing the filing of the appropriate Amended Complaint to include Issues lacking upon the application for waiver of fees. When filing to the court, the Plaintiff identified to the Court Clerk, the complaint filed is a courtesy to the court for identification of issues in part with regard to the plaintiff's application for approve of fees and the complaint would be forth coming along with claims including:

- a. Rule 83.2 Special Order for the Protection of the Accused or the Litigants in widely Publicized or Sensation Criminal or Civil Cases/ as a complaint is pending filed with Massachusetts Attorney Generals office findings on possible criminal action in connection with 35.1 (b), (c). Based on findings released about November 3, 1997, by The Office of Consumer Affairs and Business Regulations, M.G.L.c. 93. A 2(a); "Unfair competition and unfair or deceptive acts or practices in the conduct or any trade or commerce are...unlawful pursuant to violations", provided by 15 U.S.C. 1601 etseq., 12 C.F.R. 226, 15 U.S. C. 1992 et seq., 15 U.S.C. 1639.
- b. Rule 26.6 Copying expense for Discovery Materials/ for documents being ordered placing financial hardship on the plaintiff.
- c. Removal of Cause Alternatively Resolutions Rule 16.4 / of above matter filed for the purpose of protecting the plaintiff's request for Accommodation Under the American With Disabilities Act.

d. Exemption from Fed. R. Civ. P 16(b)/ Addition of New Parties (a)/Requests for Special Actions/Rule 1.3 Sanctions/Removal Rule 81.1/, said rules apply to details to be outline in the plaintiff's forth coming complaint as the above cause deals with action the government may take in a "crashworthy" vehicle claim under 15 U.S.C.A. 1392

Chapter 38, 23 and vehicle protection ...risk of personal and property damage and therefore is not necessary that a collision or death has occurred or will occur as a result of a defect in or for government to take appropriate measure with respect to such defect. Nader V. Vole, 1973, 475, Fd.916, 154, U.S. app D.C. 322, providing Chapter 27 15 U.S.C.A. 1221 automobile manufacturer shall mean any person partnership, corporation, association or other for of business enterprise engaged in manufacturing or assembling or passenger cars....which acts for...distribution of said automotive vehicles.

e. 83.53 Practice by Persons Not Members of the Bar/the plaintiff is a pro se having a written request to Attorney General for the purpose of consideration upon Notification to Relevant Law Enforcement Agencies of Discovery Obligations/Obtain Billing for Disclosure of Medical Information in Personal Injury Cases Rule 35.1 pursuant to the Patience's Bill of Rights and all of the above, as a class action.

Where fore the plaintiff moves the court to allow the above Motion upon all applicable and constitutional law as submitted by

Original
Deborah Phillips
4 Park St. Englewood, CO 8082
12/31/04

ORDERS:

The matter having been heard is hereby so Ordered:

Extension of time is continued forty-five [45] days, or _____.

JUDGE/Assisting Clerk